1 2 3 4	Peter A. Biagetti (<i>Admitted Pro Hac Vice</i>) pabiagetti@mintz.com MINTZ LEVIN COHN FERRIS GLOVSKY A One Financial Center Boston, MA 02111 Telephone: (617) 542-6000 Facsimile: (617) 542-2241	AND POPEO, P.C.
5 6 7 8 9 10 11	Seth R. Goldman (Admitted Pro Hac Vice) sgoldman@mintz.com LisaMarie F. Collins (Admitted Pro Hac Vice) lcollins@mintz.com Kerime S. Akoglu (Admitted Pro Hac Vice) ksakoglu@mintz.com MINTZ LEVIN COHN FERRIS GLOVSKY A 919 Third Avenue New York, NY 10022 Telephone: (212) 692-6845 Facsimile: (212) 983-3115 Attorneys for Defendants	AND POPEO P.C.
12	MindGeek S.à r.l., MG Freesites Ltd, MG Prer MindGeek USA Incorporated, MG Global Ent and 9219-1568 Quebec Inc.	mium Ltd, ertainment Inc.,
13 14	[Additional Defendants' Counsel continued on next page]	
15	UNITED STATES DIST	TRICT COURT
16	CENTRAL DISTRICT O	OF CALIFORNIA
17	K.A.	Case No. 2:24-cv-04786-WLH-ADS
18	Plaintiffs, N.	OTICE OF DEFENDANTS MINDGEEK S.A R.L., MG
19	\parallel	REESITES LTD, MG PREMIUM LTD, MINDGEEK USA
20		NCÓRPORATED, MG GLOBAL ENTERTAINMENT INC, AND
21		219-1568 QUEBEC INC.'S
22		OMNIBUS APPLICATION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL PURSUANT TO
23		CIVIL LOCAL RULE 79-5.2.2
24		Case Assigned to Hon. Wesley L. Hsu
25		Complaint Filed: June 7, 2024
26		Frial Date: None Set
27		
28		

1	[Additional Defendants' Counsel continued from caption page]
2	
3	Arameh Z. O'Boyle (SBN 239495) azoboyle@mintz.com Esteban Morales Fabila (SBN 273948) emorales@mintz.com
4	emorales@mintz.com MINTZ LEVIN COHN FERRIS GLOVSKY AND POPEO P.C.
5	2049 Century Park East, Suite 300
6	2049 Century Park East, Suite 300 Los Angeles, CA 90067 Telephone: (310) 586-3200 Facsimile: (310) 586-3202
7	Facsinine. (310) 380-3202
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	

	PLEASE TAKE NOTICE THAT pursuant to the Civil Minutes on the
,	Omnibus Motion to Dismiss entered in this case, Defendants MindGeek S.à r.l., MG
	Freesites Ltd, MG Premium Ltd, MindGeek USA Incorporated, MG Global
	Entertainment Inc., and 9219-1568 Quebec Inc. (collectively "MindGeek
	Defendants") have filed an Omnibus Application for Leave to File Documents Under
	Seal Pursuant to Civil Local Rule 79-5.2.2 in Support of Motions to Dismiss
,	("Omnibus Application") in the case, Fleites v. MindGeek Sà.r.l., et al., Case No.
;	2:21-cv-04920-WLH-ADS (C.D. Cal. March 28, 2025), which is hereby
)	incorporated in full into this case.
)	
	Dated: March 28, 2025 Respectfully submitted,
,	MINTZ LEVIN COHN FERRIS GLOVSKY AND POPEO, P.C.
	/s/ Esteban Morales Fabila
	Peter A. Biagetti Seth R. Goldman Arameh Z. O'Boyla
	Arameh Z. O'Boyle Esteban Morales Fabila LisaMarie F. Collins
,	Kerime S. Akoglu
	Attorneys for Defendants MindGeek, S.à r.l., MG Freesites Ltd, MG Premium Ltd, MindGeek USA
)	Incorporated, MG Global Entertainment Inc.,
)	and 9219-1568 Quebec Inc.
,	
,	
	1